

JOEL A. ACKERMAN  
JA 4027

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ZUCKER, GOLDBERG & ACKERMAN, LLC  
Attorneys for Secured Creditor  
GMAC Mortgage, LLC  
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	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
IN RE:	:	
	:	CHAPTER 13
Lucille Limone,	:	CASE NO. 09-34274-MS
	:	
DEBTOR	:	<b>AMENDED OBJECTION TO PLAN</b>
	:	Confirmation Hrg: 12/03/2009 @ 9:00am

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, LLC, attorneys for Secured Creditor, GMAC Mortgage, LLC, the holder of a First Mortgage on the debtor's premises at 29 Redwood Avenue, Wayne, NJ 07470 , in addition to the objections set forth in its original Notice of Objection, the Secured Creditor further objects to the provision in the Chapter 13 plan that fixes the monthly mortgage payment outside the plan. The normal servicing of the debtor's loan will call for the post-petition mortgage payment to be adjusted. The debtor's plan makes no provision for this adjustment in violation of 11 U.S.C. 1322 (b) (2) .

The Secured Creditor has filed a claim for arrears in the amount of \$97534.24. The Debtor's plan provides for monthly trustee distributions of \$1080.00. The Debtor's proposed plan will satisfy the Secured Creditor's claim within 90.30 months. The Secured Creditor objects as the plan's

duration is in excess of 60 months in violation of 11 U.S.C. 1322 (d) and the Debtor's plan is not feasible in violation of 11 U.S.C. 1325 (a) (6).

ZUCKER, GOLDBERG & ACKERMAN  
Attorneys for Secured Creditor  
GMAC Mortgage, LLC

/s/ JOEL A. ACKERMAN  
JOEL A. ACKERMAN  
MEMBER OF THE FIRM

DATED: October 23, 2009

<p><b>THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.</b></p>
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